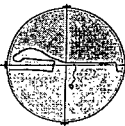


POINT RUSTON



9.3.3
1-15-07

5219 N. Shirley St., Suite 100
Tacoma, WA 98407

Phone: 253.752.2185
Fax: 253.752.7083

January 15, 2007

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

RE: Monthly Report: No. 127, December 2006
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill
Development Project Manager

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Doug Holsten - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay



Monthly Report No. 127, December 2006

Operable Unit 02

Asarco Tacoma Smelter Site

A. *Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in December.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

B. *Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Point Ruston in December are attached. There were no exceedances of the interim discharge limits.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,200 gallons of non-hazardous leachate (4.95 ppm results attached) on December 20, 2006.

C. *Work Plans and other deliverables completed and submitted during the previous month.*

1. No comments were received from EPA during the month of December.
2. Remedial Action during December included the following tasks:
 - OCF construction activities:
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
 - Stack Hill construction activities:
 - Installed and maintained erosion and surface water controls
 - Site Capping construction activities:
 - Maintained subgrade areas at the site
 - Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
 - Sediment Capping activities:
 - Continued placement of sediment cap using material from the Port of Tacoma's Blair Waterway dredging project.

D. *Actions scheduled for the next six weeks.*

1. Point Ruston does not expect to receive comments from EPA on any submittals at this time.
2. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - OCF construction activities:
 - Continue collection of leachate for offsite disposal
 - Continue monitoring of leachate volumes
 - Stack Hill construction activities:
 - Erosion controls and site maintenance
 - Begin removal of stack foundation
 - Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
 - Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite
 - Sediment Capping activities:
 - Complete placement of sediment cap using material from the Port of Tacoma's Blair Waterway dredging project

Monthly Report No. 127, December 2006

Operable Unit 02

Asarco Tacoma Smelter Site

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Point Ruston Final Remediation Design is approximately 75% complete.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.
2. Point Ruston will submit a schedule to EPA for preparation of addenda to the remedial design prepared by Asarco in accordance with paragraph 30a of the Second Amendment.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1st and 3rd Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of December 2006 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.073	14.55%	0.058	11.50%	0.058	11.50%
North Outfall	0.062	12.30%	0.036	7.25%	0.048	9.50%

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.



ENERGY LABORATORIES, INC. • P.O. Box 30916 • 1120 South 27th Street • Billings, MT 59107-0916
800-735-4489 • 406-252-6325 • 406-252-6069 fax • eli@energylab.com

LABORATORY ANALYTICAL REPORT

Client: Asarco, LLC Point Ruston LLC
Project: Tacoma Smelter, OCF Leachate
Lab ID: B06121885-001
Client Sample ID: TSM120628

Report Date: 01/03/07
Collection Date: 12/20/06 09:00
Date Received: 12/29/06
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	4.95	mg/L		0.005		E200.8	01/02/07 13:19 / car

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.